

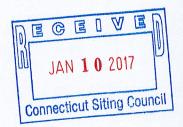
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January 10, 2017

Mr. Robert Stein, Chairman Connecticut Siting Council Ten Franklin Square New Britain, CT 06051



RE:

Docket No. 466: Frost Bridge to Campville 115-kV Project

Development & Management Plan Volume 3 Update: Change Notice Requests

Dear Chairman Stein:

Pursuant to Section 16-50j-62(a)(1) of the Regulations of Connecticut State Agencies (RCSA) and Section 7.2 of the *Development and Management Plan (D&M Plan)* for the Frost Bridge to Campville 115-kV Project (Project) New 115-kV Transmission Line and Related Transmission Line Modifications, The Connecticut Light and Power Company doing business as Eversource Energy (Eversource or the Company) requests that the Connecticut Siting Council (Council) review and approve the enclosed updated D&M Plan Volume 3, dated January 2017. The January 2017 update revises the original Volume 3, dated July 2016, to reflect proposed D&M Plan Changes identified subsequent to the Council's September 15, 2016 D&M Plan approval.

Compared to the July 2016 version, the January 2017 Volume 3 incorporates the following proposed changes:

- 1. Increase (by approximately 2.5-4 feet) in the above-ground height of certain direct embed structures. The height increases are a result of an engineering design optimization to reduce costs by reducing the depth in rock for direct embed structures.
- 2. Installation of two temporary 3-pole structures, within approved work pads, one on either side of the Naugatuck River (towns of Litchfield and Harwinton), to maintain service during the completion of the 0.4-mile separation of the 1191 and 1921 lines. The need for these temporary structures was defined by Eversource based on analyses of outage schedules and construction requirements. The structures will be required for several months, as determined by outage requirements.
- 3. Modifications to the Vegetation Removal Limits. The Vegetation Removal Limits along the eastern side of the right-of-way ROW, as shown on the January 2017 mapsheets, have been narrowed except where necessary to maintain conductor clearances and to accommodate grading at work pads.
- 4. Modifications to Limits of Disturbance. The Limits of Disturbance in certain upland portions of the ROW have been increased to provide additional space for grading, filling, and the installation of erosion and sedimentation controls near work pads and access roads in areas of steep terrain and, as necessary, for the spreading of spoil generated during foundation excavations. The need for an expansion in the Limits of Disturbance was identified by Eversource's construction contractors, after conducting additional field investigation walkdowns in December 2016.

5. An increase in the vegetation removal limits on the west side of the new 1304 Line at the Naugatuck River crossing and along an approximately 500-foot section of ROW in the Town of Harwinton in order to accommodate expanded conductor clearances along the Naugatuck River span. The expanded vegetation removal area will require approximately 0.0075 acre of clearing over vernal pool F-9-1 within the ROW and 0.053 acre of additional clearing in wetland W-F-10-1 (including 0.024 acre over a vernal pool); however, no direct impacts (i.e., temporary matting or permanent fill) to these water resources would be required.

The following attachments provide additional information regarding the updated Volume 3 and underlying D&M Plan Change Notice Requests:

- Table A lists the Volume 3 updates, by mapsheet number, and type of map modification. (Note: Although Eversource has elected to re-issue Volume 3 in its entirety, no changes were made to the cross-sections, U.S. Geological Survey topographic index maps, or Detail Sheets 2-11.)
- Attachments 1 through 4 describe and provide specific information regarding the D&M Plan
 Change Notice Requests that form the basis for the Volume 3 mapsheet revisions. The
 discussion of each proposed D&M Plan Change includes the reason for and location(s) of the
 proposed change and effects (if any) on environmental resources.

In addition, the January 2017 Volume 3 incorporates minor D&M plan changes, as identified in Eversource's December 2016 monthly construction progress report, as well as an updated Permitted Water Resource Impacts table (Detail Sheet 1), revised to reflect the regulatory approvals from the U.S. Army Corps of Engineers (issued December 19, 2016) and the Connecticut Department of Energy and Environmental Protection (issued October 13, 2016).

Eversource is providing notice of these proposed D&M Plan Changes, as well as the revised Volume 3 mapsheets, to each of the four Project towns.

Should you or other Council members have any questions regarding this submission, please do not hesitate to contact me via e-mail at kathleen.shanley@eversource.com or telephone at (860) 728-4527.

Sincerely,

Kathleen M. Shanley

Manager, Transmission Siting

Encl.

Cc: Service List

Table A: Summary Index of Proposed D&M Plan Volume 3 Map Changes, by Mapsheet

Mapsheet Number (Town)					
	Change in Structure Heights	Increase in Limits of Disturbance	Reduction in Vegetation Removal Limits Boundary (Eastern Side ROW)	Other (List)	
Watertown			71		
1		×		1. Structure 1B work pad expansion within Frost Bridge Substation (Minor D&M Plan Change, December 2016 monthly construction report to CSC. 2. Proposed use of existing access road, on Eversource property, from Echo Valley Road to Structure 2.	Increase limits of disturbance for grading/spoils at Structures 1A and 2. Illustrate fence line around Frost Bridge Substation and add temporary fence during construction.
Ŋ		×			Increased limits of disturbance to accommodate temporary stockpiling of topsoil stripped from farmlands during construction, and grading/erosion and sediment control installation adjacent to Structure 13.
9		×			Increased limits of disturbance to accommodate temporary stockpiling of topsoil stripped from farmlands during construction
7	×				
∞	×				
9/9A	×	×			Minor change for ADSS excavation/installation within area of Structures 24-26 work pad (Minor D&M Plan Change included in December 2016 construction report)
10		×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
11	×	×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
12	×		X		
13	×		×		

Volume 3			Reason for Mapshee	or Mapsheet Modification	Comments
Mapsheet Number (Town)	Change in Structure Heights	Increase in Limits of Disturbance	Reduction in Vegetation Removal Limits Boundary (Eastern Side ROW)	Other (List)	
14	×		×		
15	×	×	×	Increase in width of small section of existing access road in upland adjacent to Structure 42 to eliminate a 90 degree turn and facilitate equipment access to work pad	Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
Watertown/Thomaston	omaston				
16	×	×	×	Addition of work pad, north of Structure 46, to be used for temporary staging of timber removed from ROW along slope to the north. Proposed work pad is located within an upland area of the ROW.	Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
17		×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
18	×	×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
19	×	×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
20	×	×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
20A		×			Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
21	×		×		
22	×		×		
23	×	×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls

Volume 3			Reason for Mapshee	for Mapsheet Modification	Comments
Mapsheet Number (Town)	Change in Structure Heights	Increase in Limits of Disturbance	Reduction in Vegetation Removal Limits Boundary (Eastern Side ROW)	Other (List)	
24		×			Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
Thomaston/Litchfield	chfield				
25	×	×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
Litchfield					
26	×	×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
27	×	×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
28	×		×		
29	×	×	×		Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
30	×	×	×	Temporary three-pole structure at work pad for Structure 85 to maintain existing 115-kV service during 1191 and 1921 lines separation at Naugatuck River	Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
31			×	Mapping change in vegetation removal limits within the Naugatuck River Valley to show correct vegetation clearing limits on the west. This will encompass clearing in vernal pool VP-F-9-1. In addition, vegetation removal limits will increase north of Valley Road to accommodate conductor clearance (blowout); this will affect wetland F-10-1 and vernal pool VP-F-10-1.	Vegetation removal limits modification will affect vernal pools VP-F-9-1, VP-F-10-1, and Wetland F-10-1.

Volume 3			Reason for Mapshe	for Mapsheet Modification	Comments
Mapsheet Number (Town)	Change in Structure Heights	Increase in Limits of Disturbance	Reduction in Vegetation Removal Limits Boundary (Eastern Side ROW)	Other (List)	
Litchfield/Harwinton	vinton				
31/31A				Access road shift, within approved limits of disturbance near Structure 86 (minor D&M Plan change identified in December 2016 monthly construction report to the CSC	
Harwinton					
32			×		Modification will affect vernal pool VP-F-10-1 and Wetland F-10-1
33	×	×	×	Temporary three-pole structure at work pad for Structure 85 to maintain existing 115-kV service during 1191 and 1921 lines separation at Naugatuck River	Increased limits of disturbance to accommodate grading at work pads, spoils, and installation of erosion and sedimentation controls
34	×		×	Minor increase in width of off-ROW access road flare at intersection of access road (to Structure 94) with Wildcat Hill Road (minor D&M Plan change identified in December 2016 monthly construction report to the CSC.	
35			×		
Detail Sheet 1				Permitted Water Resources Impacts table modified per USACE and CT DEEP. Impact numbers are less than described in the CSC Application.	
Notes: 1.) Unless 11 remain the san	listed in this tak ne as in the July	ble, mapsheets had 2016 Volume 3. 2	I no changes from the July Vegetation Removal Lim	Notes: 1.) Unless listed in this table, mapsheets had no changes from the July 2016 D&M Plan Volume 3 version. In the January 2017 D&M Plan, the cross-sections, USGS map, an 11 remain the same as in the July 2016 Volume 3. 2.) Vegetation Removal Limit modifications reflect reductions in the depicted limits unless otherwise noted under "comments"	Notes: 1.) Unless listed in this table, mapsheets had no changes from the July 2016 D&M Plan Volume 3 version. In the January 2017 D&M Plan, the cross-sections, USGS map, and Detail Sheets 2-11 remain the same as in the July 2016 Volume 3. 2.) Vegetation Removal Limit modifications reflect reductions in the depicted limits unless otherwise noted under "comments".

Docket 466: Frost Bridge to Campville 115-kV D&M Plan (January 2017)

Modifications to Above-Ground Heights of Direct Embed Structures (Per Eversource Requirements for Foundation Depth in Rock) Towns of Watertown, Thomaston, Litchfield, and Harwinton; Various Volume 3 Mapsheets

The new 115-kV Frost Bridge to Campville transmission line (i.e., the 1304 Line) will include 66 direct embed structures, of which 55 will require foundation drilling in rock. During analyses of foundation construction, Eversource determined that the depth of direct embed structures in rock could be reduced slightly in order to minimize the overall amount of rock drilling, while still conforming to appropriate Company design parameters. As a result of this reduction, less drilling will be required at each of the direct embed structure sites where rock is present and result in a Project cost savings of approximately \$600,000.

However, because the 115-kV structures for the Project were already ordered when this design change was identified, the height of the structures cannot be modified. Consequently, because of the reduction in the embedment depth of the foundations, the above-ground height of each of the affected 55 structures will increase slightly (by 2.5 to 4 feet).

Table 1-1 identifies each of the Project's affected direct embed structures, by structure number, town, and Volume 3 mapsheet number, along with the above-ground height changes that will result to each structure from this design change (refer also to the structure characteristics table on the Volume 3 mapsheets).

As Table 1-1 illustrates, the 55 affected direct embed (in rock) structures will be located along the Eversource right-of-way (ROW) in each of the four Project towns as follows:

- 19 (Watertown);
- 17 (Thomaston);
- 13 (Litchfield); and
- 6 (Harwinton).

The above-ground height modifications will result in new 115-kV direct embed structures that will range in height from approximately 69.5 to 111.5 feet above ground level.

These height increases are within the approximate structure height ranges described for the new 115-kV structures in the Project Application, Volume 1, Section 3 (Table 3-2) and in the Connecticut Siting Council's Docket No. 466 Findings of Fact, which described the new 115-kV structure heights as ranging from 70-75 to 120-125 feet above ground level.

Table 1-1: Frost Bridge to Campville Direct Embed Structures: Changes to Above-Ground Height (in feet)

Town / Structure Number	Volume 3 Mapsheet Number	Initially Proposed Structure Height Above Ground	Structure Height Increase Above Ground	Final Structure Height Above Ground
Watertown				
19	7	84	2.5	86.5
20	8	103	2.5	105.5
22	9	93.5	2.5	96
29	11	66	3.5	69.5
30	11	88.5	4	92.5
31	11	79	4	83
32	11	88.5	4	92.5
33	12	88.5	4	92.5
34	12	98	4	102
35	12	88.5	4	92.5
36	13	93.5	4	97.5
37	13	88.5	4	92.5
38	14	107.5	4	111.5
40	14	79	4	83
41	14	84	4	88
42	15	103	4	107
43	15	107.5	4	111.5
44	16	84	4	88
45	16	70	3.5	73.5
Thomaston				
51	18	107.5	4	111.5
52	18	88.5	4	92.5
53	19	66	3.5	69.5
54	19	84	4	88
55	20	84	4	88
56	20	70	3.5	73.5
57	20	84	4	88
58	21	98	4	102
59	21	88.5	4	92.5
60	21	98	4	102
61	21	88.5	4	92.5
62	22	107.5	4	111.5
65	23	98	4	102
66	23	84	4	88
67	23	70	3.5	73.5
68	23	75	3.5	78.5
71	25	84	4	88

Town / Structure Number	Volume 3 Mapsheet Number	Initially Proposed Structure Height Above Ground	Structure Height Increase Above Ground	Final Structure Height Above Ground
Litchfield				
72	25	75	3.5	78.5
73	26	88.5	4	92.5
74	26	93.5	4	97.5
75	26	84	4	88
76	27	84	4	88
77	27	93.5	4	97.5
78	28	93.5	4	97.5
79	28	75	3.5	78.5
80	28	79	4	83
81	29	98	4	102
82	29	103	4	107
83	29	79	4	83
84	30	70	3.5	73.5
Harwinton				
90	33	93.5	4	97.5
91	33	75	3.5	78.5
92	34	75	3.5	78.5
93	34	84	4	88
94	34	79	4	83

Temporary Structures and Associated Temporary Guys to Facilitate Modifications to the 1191 and 1921 Line Separation at the Naugatuck River Crossing

Mapsheets 30 and 33, Towns of Litchfield and Harwinton, Respectively

To facilitate the separation of the 1191 and 1921 lines at the Naugatuck River crossing (where the lines are currently supported on the same set of lattice steel towers), Eversource proposes to install two temporary, direct-embed three-pole light-duty steel structures, one on each side of the river. Each temporary three-pole structure will be located within the right-of-way (ROW) at existing work pads two structures back from either side of the river. The temporary structure on the south side of the river is designated as Structure 3237A (Town of Litchfield), whereas the structure on the north side of the river is identified as Structure 3234A (Town of Harwinton).

The temporary structures will be used to support the 1921 Line during:

- The removal of the existing lattice steel structures (Structures 3171, Town of Litchfield, and 3174, Town of Harwinton) that presently support the 1191 and 1921 lines in a double-circuit configuration at the Naugatuck River crossing; and
- The installation of the new steel monopoles for the 1921 Line (Structures 3236, Town of Litchfield, and 3235, Town of Harwinton).

Due to outage constraints, the temporary structures will be necessary to maintain service on the 1921 Line during the line separation process. Mapsheets 30 and 33 in the January 2017 D&M Plan, Volume 3) illustrate the proposed locations of the temporary support structures, as well as the anticipated locations of the guys for each. As described below and illustrated on the January 2017 Volume 3 maps, the temporary structures are expected to be situated within previously-approved work pads, in upland areas along the ROW. The temporary structures will not result in any environmental impacts.

On the south side of the Naugatuck River (Town of Litchfield), the temporary three-pole structure (Structure 3237A) will be located within the large work pad that encompasses existing Structures 3170 (1191 Line) and 3237 (1921 Line), as well as new Structure 85 (new 1304 Line); refer to revised Mapsheet 30. This work pad is located directly north of State Route 8. Temporary guys will be situated for structure support within and outside of the work pad, in the approximate locations identified on revised Mapsheet 30. The proposed temporary poles and guys will be located entirely upland areas, within Eversource's existing ROW, on property owned by Line List No. 42054.

On the north side of the river (Town of Harwinton), the temporary three-pole structure (Structure 3234A) will be located on the northern portion of the large work pad for new Structure 88 (1304 Line; refer to revised Mapsheet 33). This work pad encompasses existing Structures 3234 and 3233 (1921 Line) and 3176 (1191 Line), and is adjacent to existing Structure 3175 (Line 1191). The work pad is in an upland area within the Eversource ROW (Line List No. 42069). Temporary guys will be situated for structure support in the approximate upland locations identified on Mapsheet 33.

Modifications to Vegetation Removal Limits and Limits of Disturbance Towns of Watertown, Thomaston, Litchfield, and Harwinton; Various Volume 3 Mapsheets

A majority of the January 2017 mapsheets include modifications to the Limits of Disturbance and Vegetation Removal Limits. Table A identifies the locations of these changes by mapsheet. The following describes the reason for each type of modification.

Modifications to Limits of Disturbance

Based on the results of additional field investigation walkdowns performed in December 2016, Eversource's Project construction contractors identified various upland locations along the ROW where additional earthwork or room for the necessary erosion and sedimentation controls would be required to facilitate construction due to topographic constraints or other factors. The contractors determined that such areas would be required, on a site-specific basis, in order to:

- Perform grading/filling as necessary to create safe and level work pads and access roads.
- Provide adequate space to install erosion and sedimentation controls.
- Store topsoil that will be temporarily removed and stockpiled in agricultural lands.
- Spread spoils generated during construction activities, principally as a result of foundation excavations.
- Provide a log staging area (work pad) within the ROW north of Structure 46 (Town of Watertown, Mapsheet 16) to facilitate vegetation removal activities.

The "Limits of Disturbance" boundary lines illustrated on the January 2017 Volume 3 mapsheets reflect these modifications.

Modifications to Vegetation Removal Limits

After the Connecticut Siting Council's approval of the D&M Plans for the Project, Eversource determined that the eastern vegetation removal limit for the new 115-kV transmission line, as depicted on the July 2016 D&M Plan Volume 3 maps, could be narrowed along most portions of the ROW between Purgatory Junction (Mapsheet 10, Town of Watertown) and Campville Substation (Mapsheet 35, Town of Harwinton). The vegetation removal limits for the portion of the new 115-kV transmission line between Frost Bridge Substation and Purgatory Junction (where the new 1304 Line will be placed between other transmission lines within the Eversource ROW) are not affected by this D&M Plan Change.

Accordingly, from Purgatory Junction (1304 Line Structure 24) to the vicinity of Campville Substation (1304 Line Structure 97), the January 2017 mapsheets reflect a reduction in the vegetation removal limits along the eastern side of the ROW, except where necessary to maintain conductor clearances and to accommodate grading and the installation of erosion and sedimentation controls at work pads.

The Vegetation Removal Limits, as flagged in the field along the ROW, reflect the modifications as shown on the January 2017 mapsheets (i.e., the narrowed clearing limit).

Modifications/Increase in Vegetation Removal Limits Naugatuck River Valley (West Side Removal Limits) and North of Valley Road Town of Harwinton, Mapsheets 31 and 32

After more detailed engineering analyses of vegetation removal requirements and conductor clearances (blow-out) for the new 1304 Line at and in the immediate vicinity of the Naugatuck River crossing, Eversource concluded that:

- 1. The western vegetation removal limits (within the ROW, near the existing 1191/1921 lines), as depicted on Mapsheet 31 of the July 2016 D&M Plan, were not illustrated as required, and did not reflect the full 45-foot width between the centerlines of the new 1304 Line structure and new 1921 Line structures. The correct vegetation removal limits in this location are depicted on the January 2017 version of Mapsheet 31. As this updated mapsheet shows, additional vegetation removal now will be required within and near Connecticut-wetland W-F9 and of a small vernal pool (VP-F9-1). This vernal pool, occupies approximately 0.0075 acre.
- Additional vegetation removal will be required within the eastern portion of the ROW between Valley Road and Structure 87. To maintain conductor clearances in this area, approximately 0.053 acre of additional forest vegetation would have to be removed within vernal pool VP-F10-1 and wetland W-F-10. Of the 0.053 acre of additional tree clearing, 0.024 acre would be within the vernal pool.

The following provides additional details regarding these proposed modifications.

<u>Clarification of Vegetation Removal Limits: West of Planned 1304 Line at Naugatuck River Crossing</u>

At the Naugatuck River crossing, the July 2016 Mapsheet 31 depicted an approximately 30-foot-wide vegetation removal limit along the west side of the new 1304 Line structures. This depiction is inconsistent with the clearing limits depicted on XS-5, which identify a 45-foot width in this area. The January 2017 Mapsheet 31 provides the correct vegetation removal limits, as illustrated on XS-5.

Based on Eversource's final engineering analyses of the conductor clearance requirements for the new 1304 Line and the reconfigured 1921 Line, vegetation within this area of the Naugatuck River valley will have to be removed or selectively cut as needed. As a result, vegetation removal near VP-F9-1 will be required.

Vernal pool F9-1 is anthropogenic in origin (refer Figure 4-1). The pool consists of a small borrow pit that was excavated below the water table. During the spring 2015 surveys for the Project, this small concentric-shaped pool contained a small number of egg masses of two vernal pool indicator species: seven wood frog (*Rana sylvatica*) and 10 spotted salamander (*Ambystoma maculatum*) egg masses. The pool has an open canopy, with no trees or shrubs present within the pool or on the immediate shoreline of the pool. However, trees nearby that presently provide shading for the pool likely will be removed.

Additional Vegetation Removal for Conductor Blow-Out: North of Valley Road

Adherence to the conductor clearance requirements is mandated by Eversource's Overhead Transmission Line Standard (OTRM) 30: Right-of-Way Vegetation Initial Clearance Standard for 115-kV and 345-kV Transmission Lines (OTRM 30). This standard complies the North American Electric Reliability Council (NERC) Vegetation Management Standard FAC-003-1, the New England Independent System Operator's (ISO-NE's) vegetation clearing standard OP-3, the ANSI/IEE C2 - National Electrical Safety Code (NESC), and the Connecticut Public Utility Regulatory Authority Sec. 16-11-134.

Per OTRM 30, Eversource calculated the vegetation clearing envelope for the 1304 Line, based on the final engineering design.

To comply with the mandated conductor clearance requirements, additional vegetation removal within VP-F10-1 is required. The January 2017 D&M Plan Volume 3, Mapsheets 31 and 32, reflect these increased vegetation removal limits. To facilitate a comparison of the proposed and previously-approved vegetation removal in this area, Figure 4-2 includes excerpts of the vegetation removal limits depicted on the approved July 2016 maps and as proposed on the January 2017 maps.

The additional vegetation clearing in VP-F10-1 and wetland F10 will have a minimal environmental effect. Approximately 0.002 acre of tree clearing was initially anticipated in VP-F10-1/W-F10.

VP-F10-1 is a cryptic (i.e., embedded) vernal pool situated within W F-10 (a hillside groundwater slope wetland). Only one tree is present within the vernal pool depression. The vernal pool contains only one tree. It is not a native vernal pool, but rather was created as a result of the prior excavation of a portion of W-F-10. This portion of the wetland now captures flow from the hillside and retains a small ponded area within which amphibian breeding was observed during Project surveys on April 18, 2015 (refer to Figure 4-3 photograph). At that time, one wood frog (*Rana sylvatica*) and two spotted salamander (*Ambystoma maculatum*) egg masses were observed. VP-F10-1 is considered a marginal breeding site, and was one of the least productive pools identified during the spring 2015 vernal pool study. Hydrology is the major limiting factor, as the pool is only shallowly ponded in the spring, with the maximum water depth limited by the presence of an outletting intermittent watercourse.

To conduct the additional vegetation removal in VP-F10-1/W-F10, Eversource proposes to stage the vegetation removal work in adjacent upland areas. Tree clearing adjacent to the pool will be limited to a few additional trees along the pool's southern and eastern banks. Where present, existing scrub-shrub vegetation within 25 feet of the vernal pool will be maintained.

Figure 4-1: Photograph of VP-F9-1 (4/18/2015)



Figure 4-2: Comparison of Vegetation Removal Limits: July 2016 and Proposed January 2017 (Excerpts from D&M Plan Mapsheets 31/32)



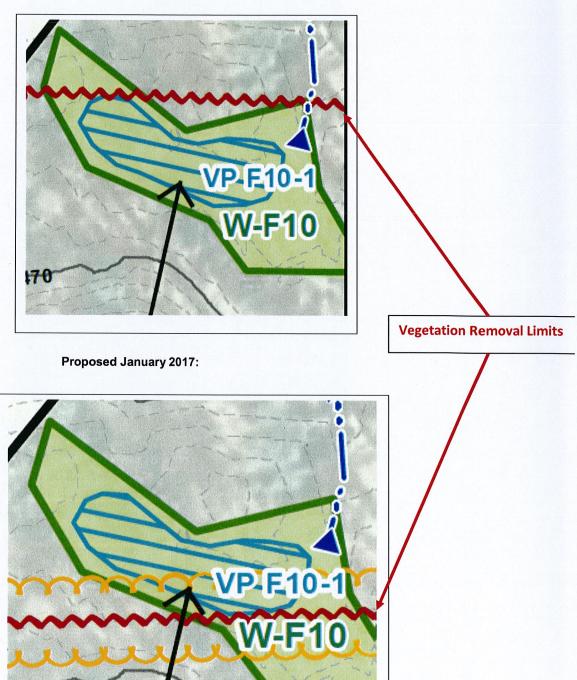


Figure 4-3: Photograph of VP-F10-1, View Looking West Toward Stream Outlet (4/18/2015)

